

P.O. Box 11263

Columbia, S.C. 29211

Phone: (803) 737-0800 Fax: (803) 737-0801

jnelson@regstaff.sc.gov

Jeffrey M. Nelson Counsel for ORS

September 10, 2007

VIA EFILING AND HAND DELIVERY

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

Re:

Petition of Piedmont Natural Gas Company, Inc. for Authority to Place Certain Defined

Benefit Post-Retirement Obligations in a Deferred Account.

Docket No.: 2007-312-G

Dear Mr. Terreni:

Please allow this correspondence to serve as notification that the Office of Regulatory Staff does not oppose the petition of Piedmont Natural Gas Company, Inc. ("Piedmont") in the above referenced docket. ORS understands that Piedmont's request to place certain defined benefit post-retirement obligations in deferred accounts is being made so that the Company's current regulatory treatment of these costs will not be altered due to Piedmont's adoption of the Financial Accounting Standard Board's Statement of Financial Accounting Standards No. 158 which is effective for fiscal years ending after December 15, 2006.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to call me.

Sincerely,

Jeffre√ M. Nelson

cc: Scott Tyler, Esq.